

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BSG RESOURCES (GUINEA) LIMITED, BSG
RESOURCES (GUINEA) SARL, and BSG
RESOURCES LIMITED,

Plaintiffs,

v.

GEORGE SOROS, OPEN SOCIETY FOUNDATIONS,
OPEN SOCIETY INSTITUTE, FOUNDATION TO
PROMOTE OPEN SOCIETY, OPEN SOCIETY
FOUNDATION, INC., ALLIANCE FOR OPEN
SOCIETY INTERNATIONAL INC., OPEN SOCIETY
POLICY CENTER, and OPEN SOCIETY FUND,

Defendants.

No. 1:17-cv-02726 (JFK) (AJP)

**DECLARATION OF JAMES FITZMAURICE
IN SUPPORT OF DEFENDANTS' REPLY MEMORANDUM OF LAW IN SUPPORT OF
DEFENDANTS' OBJECTION TO MAGISTRATE JUDGE'S ORDER**

I, JAMES FITZMAURICE, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a member of the bar of this Court and associated with the law firm of Willkie Farr & Gallagher LLP, counsel for George Soros, Open Society Foundations, Open Society Institute, Foundation to Promote Open Society, Open Society Foundation, Inc., Alliance for Open Society International, Inc., Open Society Policy Center, and Open Society Fund (collectively "Defendants"). I submit this declaration in support of Defendants' Reply Memorandum of Law in Support of Defendants' Objection to Magistrate Judge's Order, dated September 19, 2017. The facts contained in this Declaration are based upon my personal knowledge, including my review of the docket in this action.

2. Attached hereto as Exhibit 1 is Natural Resource Governance Institute's ("NRGI") letter to Magistrate Judge Peck, dated September 15, 2017.

3. Defendants did not share their Objection with NRGI or its counsel either before or after it was filed.

4. I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 19, 2017
New York, New York


James Fitzmaurice